

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

CONCORDIA UNIVERSITY TEXAS, §
Plaintiff, §

§§§§

§ Case No. 1:24-cv-176-DAE

THE LUTHERAN CHURCH - MISSOURI	\$
SYNOD, an unincorporated association of	\$
Lutheran congregations, and THE LUTHERAN	\$
CHURCH - MISSOURI SYNOD, a Missouri	\$
Corporation,	\$
Defendants.	\$

**DECLARATION OF DANIEL R. RICHARDS IN SUPPORT OF
AWARD FOR ATTORNEY'S FEES**

I, Daniel R. Richards, declare and state as follows:

1) I am an attorney with Richards, Rodriguez & Skeith, L.L.P. and have been retained to represent Concordia University Texas (“CTX”) in the above-referenced lawsuit. I have been practicing litigation in Travis County and throughout the State of Texas since 1994. I am familiar with the customary, reasonable, and necessary attorney’s fees and expenses incurred in Texas in litigation of this nature.

2) Attached hereto as **RICHARDS-1** are true and correct copies of the time entries reflecting the time spent and tasks performed in representing CTX in this matter with regard to obtaining relief for the Motion for Remand against the Lutheran Church – Missouri Synod, an unincorporated association of Lutheran congregations (“Synod”) and the Lutheran Church – Missouri Synod, a Missouri Corporation (“LCMS”). My partners Clark Richards, Albert Carrion, and Jennifer Richards, and my paralegal Karina Esparza, and I recorded time in the customary manner billed at an hourly rate. The billing records reflect the name of the professional, the task, the billing rate, and the time expended. Our billing rates for this lawsuit are reflected in the chart below:

<u>Attorney/Paralegal</u>	<u>Hourly Rates</u>
Clark Richards, Attorney	\$ 450.00
Albert Carrion, Attorney	\$ 450.00
Jennifer Richards, Attorney	\$ 375.00
Daniel Richards, Attorney	\$ 450.00
Karina Esparza, Paralegal	\$ 210.00

I am familiar with the rates charged by attorneys in Texas for litigation and appellate matters and these rates are reasonable when compared with the customary rates of attorneys in Texas for lawsuits such as this one.

3) The total legal fees and expenses incurred by CTX in prosecuting its Motion for Remand against Synod and LCMS as of January 3, 2025, are \$24,222.75. These fees are reasonable and necessary for the services performed.

4) As shown in **RICHARDS-1** the total legal fees incurred on actions specific only to the removal of this suit and the Motion for Remand was **\$8,832.00**. On the same day CTX filed its Motion for Remand, it also filed a Motion to Dismiss in the consolidated suit *LCMS v. Christian, et al.* No. 1:23-CV-01042-DAE. LCMS filed a single response to both pleadings. CTX therefore filed a single reply, and LCMS filed a single motion for sur-reply. The total fees incurred as a result of these joint briefings were \$17,469.00. To segregate the fees between the Motion to Dismiss and the Motion for Remand, we allocated half of the fees from these joint briefings to each motion. The total portion of these fees allocated to the Motion to Remand was **\$8,734.50**. In addition, on December 20th LCMS and Synod filed Objections to the Magistrate Judge's Report and Recommendation which recommends this case be remanded and the consolidated case dismissed. LCMS included both new arguments and new evidence in its objections. The fees incurred preparing a response to LCMS's objections were \$13,312.50 Utilizing the same segregation method as that for the joint briefings, we estimate the total fees incurred to respond to LCMS and Synod's Objections for the Motion to Remand will be **\$6,656.25**.

5) It is my opinion that the fees set forth herein and in the attached are reasonable and necessary based upon the following factors:

- a. The novelty and difficulty of the issues involved and the skill required to provide the legal services properly;
- b. The time and labor involved to perform the legal services properly;
- c. The fee customarily charged in the community for similar services;
- d. The amounts involved and the results obtained;
- e. The time limitations imposed by the circumstances;
- f. The experience, reputation, and ability of the attorneys performing the services.

6) Based on the foregoing, the Plaintiff is requesting an award of **\$24,222.75** in attorney's fees and expenses incurred by CTX in its prosecution of its claims against LCMS and Synod.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 8, 2025



DANIEL R. RICHARDS

Exhibit RICHARDS-1 to Declaration of Daniel R. Richards
Page 1 of 11**Concordia University Texas**
Case 1:24-cv-176-DE; CTX vs. LCMS
Richards Rodriguez & Skeith, LLP
Fees for Motion for Remand

<u>Trans Date</u>	<u>Tkpr</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Description</u>
02/22/2024	Albert Carrion	450.00	0.4	\$180.00	Read Special Appearance, Answer and Affirmative Defenses and Notice of Removal filed by LCMS in State Court lawsuit.
02/22/2024	Clark Richards	450.00	0.2	\$90.00	Review rules for removal and remand.
02/23/2024	Jennifer Richards	375.00	0.5	\$187.50	Review federal rules on motions to remand and motions to consolidate; email to co-counsel re: same
03/11/2024	Albert Carrion	450.00	0.8	\$360.00	Legal research re: Texas cases supporting court's assertion of jurisdiction over religious entities.
03/14/2024	Jennifer Richards	375.00	0.3	\$112.50	Prepare motion to extend responsive pleading deadline in federal removal suit, removed from state court proceedings by LCMS
03/18/2024	Karina Esparza	210.00	0.2	\$42.00	Finalize and file motion for extension of time to file motion to remand.
03/27/2024	Jennifer Richards	375.00	0.5	\$187.50	Review and analyze notice of removal, attached affidavit, and notice to the court
03/27/2024	Jennifer Richards	375.00	0.5	\$187.50	Review rules on motion for remand and legal research for RLUIPA cases on determining organizational capacity
03/28/2024	Jennifer Richards	375.00	1.1	\$412.50	Motion for Remand - draft introduction, Rule 7.1 Disclosure Statement, and party portion of facts
03/28/2024	Jennifer Richards	375.00	1.1	\$412.50	Prepare Motion for Remand - drafted dispute and proceedings fact sections and drafted citizen and capacity section of argument
03/28/2024	Clark Richards	450.00	0.3	\$135.00	Analyze posture of removal to develop strategy for motion to remand.
03/28/2024	Jennifer Richards	375.00	0.4	\$150.00	Prepare outline for motion to remand.
03/29/2024	Jennifer Richards	375.00	0.9	\$337.50	Legal research on converting real party in interest and real party in

Exhibit RICHARDS-1 to Declaration of Daniel R. Richards**Page 2 of 11**

<u>Trans Date</u>	<u>Tkpr</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Description</u>
					controversy arguments to standard for motion for remand
03/29/2024	Jennifer Richards	375.00	1.1	\$412.50	Prepare motion for remand fact section on Synod's "rights and interests" in the dispute
03/30/2024	Jennifer Richards	375.00	0.7	\$262.50	Legal research reviewing case law on standard for proper and improper joinder under removal statute
03/30/2024	Jennifer Richards	375.00	0.2	\$75.00	Conference with CRichards re: removal statute
03/30/2024	Jennifer Richards	375.00	0.6	\$225.00	Revise argument standard of review sections to align with removal statute language.
03/30/2024	Jennifer Richards	375.00	0.7	\$262.50	Prepare standard of review and proper claims against Synod argument section of motion for remand
04/01/2024	Jennifer Richards	375.00	0.9	\$337.50	Prepare indispensable party portion of motion for remand and request for judicial notice of the filings in the proceedings initiated by LCMS
04/01/2024	Jennifer Richards	375.00	0.9	\$337.50	Review and edit motion for remand
04/01/2024	Clark Richards	450.00	0.7	\$315.00	Revise and edit motion to remand.
04/02/2024	Jennifer Richards	375.00	0.2	\$75.00	Conference with DRichards re: edits to Motion to remand
04/02/2024	Albert Carrion	450.00	0.9	\$405.00	Review and revise motion to remand.
04/02/2024	Clark Richards	450.00	0.8	\$360.00	Additional revisions and edits to motion to remand.
04/02/2024	Daniel Richards	450.00	0.8	\$360.00	Read and edit motion to remand.
04/02/2024	Daniel Richards	450.00	0.2	\$90.00	Discussions with Jennifer re motion to remand.
04/03/2024	Jennifer Richards	375.00	0.5	\$187.50	Review edits and revise motion to remand
04/03/2024	Jennifer Richards	375.00	0.1	\$37.50	Review and accept edits made to Motion to Remand
04/03/2024	Albert Carrion	450.00	0.5	\$225.00	Review and revise Motion to Remand to prepare for filing.
04/03/2024	Karina Esparza	210.00	0.7	\$147.00	Proofread and edit motion to remand and compile exhibits to same.

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<u>Trans Date</u>	<u>Tkpr</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Description</u>
04/03/2024	Karina Esparza	210.00	0.3	\$63.00	Finalize and file motion to remand.
05/14/2024	Karina Esparza	210.00	0.2	\$42.00	Draft unopposed motion and proposed order to extend deadline for reply brief iso motion to remand.
05/14/2024	Karina Esparza	210.00	0.2	\$42.00	Draft unopposed motion and proposed order to exceed page limit for reply brief iso motion to remand.
05/23/2024	Karina Esparza	210.00	0.2	\$42.00	Proofread and edit Unopposed Motion for Leave to Exceed Page limit for reply iso motion to remand.
05/23/2024	Karina Esparza	210.00	0.2	\$42.00	Proofread and edit Reply iso motion to remand.
12/13/2024	Jennifer Richards	375	0.3	112.5	Preparing legal outline for motion for fees on remand
12/13/2024	Karina Esparza	210	0.2	42	Calculate fees for motion for remand.
12/16/2024	Jennifer Richards	375	0.7	262.5	Review Pleadings and magistrate recommendation for citations for motion for fees on remand
12/17/2024	Jennifer Richards	375	0.4	150	Review and organize fee report for motion for fees on removal and remand
12/17/2024	Jennifer Richards	375	1.6	600	Prepare motion for fees
12/17/2024	Jennifer Richards	375	0.2	75	Conference with CRichards re: motion for fees
12/17/2024	Jennifer Richards	375	0.4	150	Prepare fee segregation for fees incurred as a result of the joint response/reply to motion to dismiss and motion for remand
12/17/2024	Jennifer Richards	375	0.8	300	Edit DRichards fee declaration
					GRAND TOTALS
Billables			23.4	\$8,832.00	

Exhibit RICHARDS-1 to Declaration of Daniel R. Richards
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Concordia University Texas
Case 1:24-cv-176-DE; CTX vs. LCMS
Richards Rodriguez & Skeith, LLP
Fees for Reply iso Motion for Remand and Motion to Dismiss

<u>Trans Date</u>	<u>Tkpr</u>	<u>Rate</u>	<u>Hours to</u> <u>Bill</u>	<u>Amount</u>	<u>Description</u>
03/14/2024	Clark Richards	450.00	0.4	\$180.00	Revise and edit motions for extension of time to file responsive pleadings and motion to remand.
03/14/2024	Jennifer Richards	375.00	0.1	\$37.50	Conference with CRichards re: motions to extend time
03/26/2024	Jennifer Richards	375.00	0.3	\$112.50	Conference with CRichards re: capacity briefing for motion to dismiss and briefing for motion for remand
03/26/2024	Daniel Richards	450.00	0.4	\$180.00	Discussion with Don Christian and Chris Bannwolf re remand and motion to dismiss.
04/02/2024	Jennifer Richards	375.00	0.3	\$112.50	Review and revise edits by co-counsel on Motion to Dismiss and Motion for Remand
05/13/2024	Albert Carrion	450.00	1.2	\$540.00	Study LCMS Response to Motion to Dismiss and Remand and attached Silas Declaration.
05/13/2024	Albert Carrion	450.00	0.5	\$225.00	Strategy meeting to discuss Reply to LCMS Response to Motion to Dismiss.
05/13/2024	Albert Carrion	450.00	0.2	\$90.00	Correspondence to D. Christian forwarding LCMS Response to Motion to Dismiss and Remand and overview of response.
05/13/2024	Clark Richards	450.00	0.2	\$90.00	Analyze arguments by Synod in response to motions to dismiss and remand.
05/13/2024	Clark Richards	450.00	0.2	\$90.00	Correspondence with opposing counsel regarding extension of time for reply brief.
05/13/2024	Clark Richards	450.00	0.2	\$90.00	Develop strategy for reply brief.
05/13/2024	Daniel Richards	450.00	0.5	\$225.00	Read response to motion to dismiss and discuss next steps with Albert, Clark and Jennifer.
05/13/2024	Jennifer Richards	375.00	1	\$375.00	Receipt and review Concordia response to motion to dismiss and motion to remand

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<u>Trans Date</u>	<u>Tkpr</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Description</u>
05/13/2024	Jennifer Richards	375.00	0.5	\$187.50	Conference with CRichards, DRichards, and ACarrion re: Reply to response to motion to dismiss
05/14/2024	Clark Richards	450.00	0.4	\$180.00	Developing arguments and strategy for reply brief.
05/14/2024	Clark Richards	450.00	0.2	\$90.00	Revise motion for extension of time for reply brief.
05/14/2024	Clark Richards	450.00	0.4	\$180.00	Revise and edit outline for reply brief.
05/14/2024	Jennifer Richards	375.00	1.8	\$675.00	Reviewing Serbian E. Orthodox Diocese v. Milivojevic, cited in response as prohibiting determination of jurisdiction, and its progeny
05/14/2024	Jennifer Richards	375.00	0.3	\$112.50	Conference with CRichards re: replying to response's first amendment arguments
05/14/2024	Jennifer Richards	375.00	1.1	\$412.50	Revise reply outline to include response to 1st amendment defense and appropriate case law from previous research and to restructure based on Masterson adoption of neutral principles
05/14/2024	Jennifer Richards	375.00	0.5	\$187.50	Review Masterson for relevant holdings regarding neutral principles of law
05/14/2024	Jennifer Richards	375.00	0.5	\$187.50	Legal research reviewing case law on principles of interpretation of corporate governance documents
05/14/2024	Jennifer Richards	375.00	0.4	\$150.00	Review and analyze LCMS corporate formation documents
05/14/2024	Jennifer Richards	375.00	0.2	\$75.00	Email to DRichards and ACarrion re: highlights of response content
05/16/2024	Jennifer Richards	375.00	0.4	\$150.00	Conference with CRichards re: Reply structure
05/16/2024	Jennifer Richards	375.00	1	\$375.00	Redraft section (b)(1) (formerly (a)(1)) of Reply to motion to dismiss
05/16/2024	Jennifer Richards	375.00	0.3	\$112.50	Draft new argument section II(a) to Reply
05/16/2024	Jennifer Richards	375.00	0.7	\$262.50	Review Turner, Tankersley, and Herbert cases cited by Plaintiff in response; prepared outline of argument to these cases for Reply.
05/17/2024	Jennifer Richards	375.00	0.9	\$337.50	Draft Reply argument section (II)(b)(ii) re: LCMS reliance on non-Texas case law
05/17/2024	Jennifer Richards	375.00	0.6	\$225.00	Review response section on F.E.L. Publ'ns, Ltd. v. Catholic Bishop of Chicago

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<u>Trans Date</u>	<u>Tkpr</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Description</u>
					and added to Reply section II(b)(ii) to address argument
05/17/2024	Jennifer Richards	375.00	0.5	\$187.50	Review response sections related to real party in interest/real party in controversy and edit Reply outline to match
05/17/2024	Jennifer Richards	375.00	0.8	\$300.00	Draft Reply section II(b)(iii) on Freedom of Religion argument
05/18/2024	Jennifer Richards	375.00	1	\$375.00	Review cases on diversity jxd for trusts cited by Response: Navarro Springs, Justice, Bynane, Corfield, and Hometown.
05/18/2024	Jennifer Richards	375.00	2	\$750.00	Draft Reply section responding to argument that LCMS should be treated as a trust
05/18/2024	Jennifer Richards	375.00	0.3	\$112.50	Draft introduction to Reply argument section II(c)
05/19/2024	Jennifer Richards	375.00	0.9	\$337.50	Draft introductory paragraph to Argument section (c) and draft argument section (c)(i) on the alleged misrepresentation of Synod's documents
05/19/2024	Jennifer Richards	375.00	0.5	\$187.50	Drafting Reply to response's attempt to distinguish Hummel
05/19/2024	Jennifer Richards	375.00	0.3	\$112.50	Draft Reply section to response argument re: unincorporated division
05/20/2024	Jennifer Richards	375.00	0.4	\$150.00	Legal research amicus capacity
05/20/2024	Jennifer Richards	375.00	0.8	\$300.00	Draft Reply section to response on amicus curiae
05/20/2024	Jennifer Richards	375.00	0.3	\$112.50	Conference with CRichards re: long-arm jurisdiction
05/20/2024	Jennifer Richards	375.00	0.8	\$300.00	Legal research on whether citizenship of an unassociated association is sufficient for in personam jxd
05/20/2024	Jennifer Richards	375.00	1.3	\$487.50	Draft Reply section responding to argument that Texas courts do not have in personam jurisdiction over Synod
05/20/2024	Jennifer Richards	375.00	0.4	\$150.00	Legal research on consent to jurisdiction by filing suit
05/21/2024	Clark Richards	450.00	0.9	\$405.00	Read and analyze LCMS response to motions to dismiss and remand.
05/21/2024	Clark Richards	450.00	3	\$1,350.00	Review and initial edits to reply brief in support of motions to dismiss and remand.

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<u>Trans Date</u>	<u>Tkpr</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Description</u>
05/21/2024	Jennifer Richards	375.00	0.7	\$262.50	Finish drafting Reply section on in personam jurisdiction
05/21/2024	Jennifer Richards	375.00	1	\$375.00	Reviewing draft Reply and comparing it with draft response to check for missing arguments
05/21/2024	Jennifer Richards	375.00	1.2	\$450.00	Review and revise draft Reply
05/21/2024	Jennifer Richards	375.00	0.1	\$37.50	Edit citations to record documents
05/22/2024	Jennifer Richards	375.00	0.3	\$112.50	Conference with CRichards re: structural edits to Reply
05/22/2024	Jennifer Richards	375.00	1.2	\$450.00	Review and revise structure of Reply draft
05/22/2024	Jennifer Richards	375.00	0.3	\$112.50	Legal research on 5th circuit case law prohibiting consideration of extrinsic evidence on a facial jurisdictional attack
05/22/2024	Jennifer Richards	375.00	0.1	\$37.50	Conference with CRichards re: edits to the reply
05/22/2024	Jennifer Richards	375.00	0.5	\$187.50	Review and revise reply in support to motion to dismiss and motion to remand
05/22/2024	Albert Carrion	450.00	1.9	\$855.00	Review and revise draft of Reply to Response to Motion to Dismiss.
05/22/2024	Clark Richards	450.00	1.2	\$540.00	Review and analyze revised draft reply brief in support of motions to dismiss and remand; revise and edit reply brief.
05/23/2024	Jennifer Richards	375.00	0.4	\$150.00	Conference with CRichards and ACarrion re: edits to draft reply brief.
05/23/2024	Jennifer Richards	375.00	0.1	\$37.50	Revise and finalize edits to Reply brief
05/23/2024	Albert Carrion	450.00	0.4	\$180.00	Review and discuss revisions to Reply to Motion to Dismiss.
05/23/2024	Clark Richards	450.00	1.1	\$495.00	Final revisions to reply brief in support of motions to dismiss and remand for filing.
05/30/2024	Clark Richards	450.00	0.4	\$180.00	Research on case law regarding proposed sur-reply by LCMS.
05/30/2024	Clark Richards	450.00	0.2	\$90.00	Correspondence to opposing counsel regarding opposition to LCMS proposed sur-reply.
06/04/2024	Jennifer Richards	375.00	0.3	\$112.50	Review and analyze LCMS's motion for sur reply

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<u>Trans Date</u>	<u>Tkpr</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Description</u>
06/04/2024	Jennifer Richards	375.00	1.4	\$525.00	Prepare opposition to Plaintiff's motion for leave to file surreply
06/04/2024	Clark Richards	450.00	0.5	\$225.00	Revise and edit response to motion for leave to file surreply.
06/04/2024	Karina Esparza	210.00	0.5	\$105.00	Proofread, edit and file CTX Opposition to LCMS Motion for Leave to File Sur-Reply.
06/04/2024	Karina Esparza	210.00	0.2	\$42.00	File CTX Opposition to LCMS Motion for Leave to File Surreply in Federal Dec. Action matter.
06/04/2024	Karina Esparza	210.00	0.2	\$42.00	Correspondence to clients re motion for leave to file surreply and opposition to same.
			GRAND TOTALS		
			Billable 44.1	\$17,469.00	

Exhibit RICHARDS-1 to Declaration of Daniel R. Richards
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Concordia University Texas
Case 1:24-cv-176-DE; CTX vs. LCMS
Richards Rodriguez & Skeith, LLP
Fees on Response to Objections to Magistrate Judge Report & Recommendation

<u>Trans Date</u>	<u>Tkpr</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Description</u>
12/20/2024	Daniel Richards	450.00	0.20	\$90.00	Discussion with Clark re LCMS brief on objections to Magistrate Report and Recommendation.
12/23/2024	Jennifer Richards	375.00	0.90	\$337.50	Legal research on rules and standards regarding objections to a magistrate's report and recommendation
12/23/2024	Jennifer Richards	375.00	2.00	\$750.00	Review and analyze LCMS objections to the Magistrate Report and Recommendation
12/23/2024	Jennifer Richards	375.00	0.40	\$150.00	Conference with CRichards and DRichards re: LCMS objections
12/23/2024	Jennifer Richards	450.00	0.40	\$180.00	Analyze and develop strategy for response to objection to magistrate report.
12/23/2024	Daniel Richards	450.00	0.50	\$225.00	Discussion re new filing and affidavit of LCMS.
12/23/2024	Albert Carrion	450.00	0.60	\$270.00	Study objections to Magistrate's Report filed by LCMS and attached declaration of J. Sias.
12/24/2024	Jennifer Richards	375.00	0.30	\$112.50	Legal research re definition of unincorporated association in federal case law
12/24/2024	Jennifer Richards	375.00	0.40	\$150.00	Begin draft outline to respond to LCMS objections to Magistrate report and recommendation
12/24/2024	Jennifer Richards	375.00	0.50	\$187.50	Review motion to dismiss and motion for remand
12/24/2024	Jennifer Richards	375.00	0.50	\$187.50	Review Magistrate Report and Recommendation
12/24/2024	Jennifer Richards	375.00	0.80	\$300.00	Review case law on deference allowed to Magistrate's report and recommendation and draft outline of standard of review section of argument.
12/24/2024	Jennifer Richards	375.00	0.40	\$150.00	Prepare portions of outline of Response to obj. on Tex. Bus. Org. Code argument
12/26/2024	Jennifer Richards	375.00	0.80	\$300.00	Outline portion responding to Tex. Bus. & Org. Code arguments from LCMS

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<u>Trans Date</u>	<u>Tkpr</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Description</u>
					objections to magistrate report
12/26/2024	Jennifer Richards	375.00	0.60	\$225.00	Legal research reviewing cases which require citizenship of unincorporated associations to be determined by its membership
12/26/2024	Jennifer Richards	375.00	0.60	\$225.00	Legal research on case law regarding interpretation of the TUUNA
12/26/2024	Jennifer Richards	375.00	1.70	\$637.50	Reviewing case law on internal affairs doctrine and full faith and credit clauses, and their application to procedural laws of forum states; added relevant case law to outline.
12/26/2024	Jennifer Richards	375.00	1.40	\$525.00	Reviewing case law on procedural veil piercing of the corporate form
12/26/2024	Jennifer Richards	375.00	0.20	\$75.00	Adding reverse veil piercing law to outline
12/26/2024	Daniel Richards	450.00	0.60	\$270.00	Read Objection to report and recommendation in prep for potential arguments.
12/26/2024	Daniel Richards	450.00	0.50	\$225.00	Discussion with Jennifer and Clark re LCMS's objections to Magistrate Report and Recommendation and argument for same.
12/26/2024	Daniel Richards	450.00	0.40	\$180.00	Compare LCMS's objections to 1st Amended Complaint.
12/27/2024	Jennifer Richards	375.00	2.60	\$975.00	Prepare outline response to LCMS's objections to the Magistrate Report and Recommendation based on the 1st Amendment
12/27/2024	Jennifer Richards	375.00	1.80	\$675.00	Drafting response to LCMS objections - introduction and fact sections, and standard of review for argument
12/27/2024	Jennifer Richards	375.00	0.20	\$75.00	Telephone call with DRichards about objections and response
12/27/2024	Jennifer Richards	450.00	1.00	\$450.00	Review pleadings and identify claims by Synod as opposed to LCMS for objection to report and recommendation.
12/28/2024	Jennifer Richards	375.00	4.50	\$1,687.50	Draft response to LCMS objections argument sections on the interpretation of Texas' unincorporated association's act, the internal affairs doctrine, and several constitutional clauses
12/29/2024	Jennifer Richards	375.00	0.70	\$262.50	Review and revise draft intro, facts, and first argument sections in response to LCMS's objections

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<u>Trans Date</u>	<u>Tkpr</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Description</u>
12/29/2024	Jennifer Richards	375.00	1.90	\$712.50	Draft response to objections based on church autonomy doctrine and 1st Amendment, and prayer
12/30/2024	Jennifer Richards	375.00	2.30	\$862.50	Review and revise response to LCMS objections; send to CRichards for review
12/30/2024	Albert Carrion	450.00	0.60	\$270.00	Review draft Response to LCMS Objections to Magistrate's report.
12/30/2024	Clark Richards	450.00	0.50	\$225.00	Review and analyze objections to magistrate report and new affidavit of Sias.
12/30/2024	Clark Richards	450.00	1.30	\$585.00	Revise and edit response to objections to magistrate report.
12/30/2024	Clark Richards	450.00	0.90	\$405.00	Research on case law regarding objections to magistrate report.
12/31/2024	Jennifer Richards	375.00	0.80	\$300.00	Review and revise draft response to LCMS objections based on CRichards edits
12/31/2024	Jennifer Richards	375.00	0.20	\$75.00	Research on page limitations for objections to magistrate findings
			GRAND TOTALS		
Billable			34.00	\$13,312.50	